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August 15, 2019

BY ECF

The Honorable Cheryl L. Pollak Magistrate Judge United States District Court for the Eastern District of New York 225 Cadman Plaza East, Courtroom 13B South Brooklyn, New York 11201

> RE: Hall, et al. v. Nassau County, et al. Civil Action No. 19-cv-00893 (LDH/CLP)

Dear Judge Pollak:

We represent defendants Nassau County, the Department of Assessment of Nassau County and the Assessment Review Commission of Nassau County (the "County Defendants") in the above noted action. We write jointly with counsel to plaintiffs to request an adjournment of the Initial Conference currently scheduled for August 19, 2019.

Yesterday afternoon Judge Hall *sua sponte* adjourned the pre-motion conference in advance of the County Defendants' forthcoming motion to dismiss the Complaint that was originally scheduled for today until September 12, 2019. Pursuant to Judge Hall's rules, we expect the Court will set a briefing schedule for the County Defendants' motion at the September 12 conference.

Because the County Defendants' motion to dismiss will in large part address threshold issues of jurisdiction and standing, the parties believe it is desirable to stay discovery pending the Court's determination of that motion. Accordingly, the parties jointly request that the Initial Conference be adjourned for 90 days to November 18, 2019. This is the parties' fourth request to adjourn the Initial Conference. The parties are prepared to file a status report every 30 days commencing on September 18, 2019.

Respectfully submitted,

Regina M. Calcaterra

all parties via ECF

cc: 805720